



## NATURE RESERVES PRESERVATION GROUP

KALAMUNDA WA 6926

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To: [Rhonda.Hardy@kalamunda.wa.gov.au](mailto:Rhonda.Hardy@kalamunda.wa.gov.au)

Date. 26 November 2021

**Subject: Cambridge Reserve. Business Plan for Major Land Transaction. Oct 2021.**

Dear Rhonda,

This submission is on behalf of Nature Reserves Preservation Group (NRPG) Inc. The length and complexity of this project has made making a submission somewhat confusing. Given its convoluted history, involving many diagrams and maps of proposals, this submission will refer **only** to the maps and diagrams used within this business plan. Reference will, however, be made to our submission (14 August 2018), on the Cambridge Reserve Landscape Concept Plan.

As stated in that submission, “...*the main concern of NRPG is the retention and management of as much native vegetation as possible. We maintain the starting point for any development should be the existing natural assets of the location. Once these have been established, by comprehensive environmental assessments, the development should be designed around these assets.*”

We would now emphasise the importance of areas other than those of high conservation value. Such areas, once rehabilitated, can serve as environmental buffers, wildlife corridors and linkages. They also help to provide a ‘sense of place’ and, by their creation, are cheaper to maintain than manicured parks and lawns.

For ease of reading, extracts from the Business Plan Report will be italicised, followed by ‘boxed’ NRPG comments.

Although the financial implications of this transaction are of interest, on which brief comment will be made, the focus of the submission will be on the following section:

### ***Section 3. Cambridge Reserve Community Enhancement Project.***

- a) Flora Survey and Floristic Community Type Analysis;*
- b) Preliminary Environmental Management Plan;*
- c) Geotechnical Report;*
- d) Water Modelling and Local Water Management Strategy;*
- e) Bushfire Management Plan;*

In turn, the survey has resulted in the “*Retention and protection of three areas of Threatened Ecological Communities*”.

It is encouraging to hope our 2018 submission requests for environmental studies encouraged the production of some of the above. Whilst the above are pleasing to see, sections of the **Landscape Concept Plan** legend/notes tables, leave room for concern. Given that much of the rest of the Business Plan Report may be subject to change (see later remarks), we trust there will be an opportunity for further public comment, before the ‘concept’ becomes an active development.

**Items of concern:**

**Figure 5.**

**Legend.**

*3. Fenced Threatened Ecological Communities (TEC)*

To guarantee adequate protection of the biodiversity in such areas, careful consideration of the type of fencing to be used, is essential. Care must be taken to ensure ecological linkages are maintained and fauna are still able to use wildlife corridors and linkages after fencing is installed. The City has the experience to ensure this is carried out correctly. It will then be vital that the City ensures it provides ongoing budget allocations for the care and maintenance of such fencing, perhaps set aside from the estimated \$4.5m net revenue from the transaction.

*5. Bush Re-vegetation*

See comments on Note 4, below.

*8. 3m Limestone Maintenance Track*

Whilst the use of limestone for such constructions is widely accepted, construction should ensure careful attention is given to avoiding any possibility of dieback (Phytophthora) pathogens becoming established. Several years ago, ‘cracker dust’ was being tested to assess its dieback resistance. There may now be other dieback-resistant materials available and local to this area.

*14. (TEC) zone*

The satisfaction from seeing these zones defined on the concept plan is severely tempered by concerns over how such communities will be protected. For their adequate protection, there is a requirement for the establishment of ‘buffer zones’. Whilst such zones appear on some diagrams, given the number of diagrams present in the draft, the extent of these is unclear. Are the areas designated ‘5. Bush re-vegetation areas’, intended to be these buffers? Unless such buffers are adequate, outer boundaries of TEC zones will come under threat from dangers including weed ingress.

*15. Fire Hazard Reduction Zone*

Always a difficult zoning, its creation should, within the restrictions of State Planning Policy 3.7, and its guidelines, attempt to retain as much native vegetation as possible. Options other than reducing the fuel loads should first be explored, despite such options adding to the costs of the development. Clearing of the native vegetation should not be the initial default design.

## Figure 5.

### Notes.

1. *Concept is indicative only and subject to detailed design.*

Whilst it is accepted that, at later design stages, changes will be required, it is essential public comment be sought on all such changes before the project is finalised.

2. *Extent of lighting is to be determined during detailed design.*

Once detailed design has determined the lighting extent and levels, public comment should be invited. Lighting levels should be reduced to the safe minimum in and around the areas of native vegetation serving as habitat for native fauna. The National Light Pollution Guidelines for Wildlife should be followed. Ref.

<https://www.awe.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife>

4. *Re-vegetation is to be carried out using endemic and/or native species.*

Long-term funding will be essential for any revegetation projects. Adequate funding for preparatory and ongoing weed suppression should also be part of this. The comment “*revegetation is to be carried out using endemic and/or native species*” needs clarification. We would suggest the term “*endemic species*” or simply “*native endemic species*” be used.

5. *Extent of all re-vegetation works are subject to bushfire assessment and requirements.*

Consideration of the bushfire assessment and requirements should be conducted in a way that is sensitive to the importance of native vegetation to flora and fauna. Solutions should not simply be the cheapest and most convenient options. Close liaison with the City’s environmental staff is essential in this stage of any development.

8. *Parking locations and quantities are indicative only and subject to technical advice.*

This simple statement gives great cause for concern. Past experience suggests that the initial requirements for parking locations and quantities are invariably underestimated. Ensuing increases in parking areas inevitably result in further losses of vegetation. All parking bay designs must comply with an appropriate tree to bay ratio. City of Kalamunda **draft LPS 33-Tree protection (5.3.4 Design of car parking spaces, ‘Deemed-to comply’ requirement C4.3)** proposes using “...*one shade tree between each four external car parking spaces.*” Using suitable native trees, this would be a good starting point for this current proposal. Every demand for extra parking locations or extent, should be challenged, with developers required to provide a strong case for any such increases or variations.

9. *TEC areas will be subject to rehabilitation/re-vegetation as part of public open space upgrades.*

Given our reservations over the environmental validity of the City’s Public Open Space Strategy, outlined in our submission of March 2018, we request that these be taken into consideration here. The City should ensure that any *rehabilitation/re-vegetation* should be under the control of Environmental, rather than Planning staff or at least, close coordination between the two sections is guaranteed.

## ***Section 4. Proposed Acquisition and Future Development.***

*“The net revenue to the City is estimated to be approximately \$4.5m.”*

This estimated net revenue presents a unique opportunity for the City to use some of this to guarantee protection of the retained environmental assets of the site. Serious consideration should be given to the purchase of other bushland areas for conservation purposes. Such an initiative would help to offset the continuing loss of bushland and improve the likelihood of the City achieving its Clean and Green objectives. Whilst it is acknowledged there will be competing claims on this revenue, failure to make use of a realistic portion of this revenue in the service of the natural environment, will make it difficult for Clean and Green objectives 2.1 and 2.1.4, to be achieved (see also comments at *Figure 3 Legend (TEC)*, above).

## ***Section 5.4 Expected effect on matters referred to in the local government’s plan prepared under section 5.56***

### ***Priority 2 – Kalamunda Clean and Green***

*“Objective 2.1 To protect and enhance the environmental values of the city”*

*“Strategy 2.1.4 Increasing and protecting local biodiversity and conservation, wherever possible, through integrating ecosystem and biodiversity protection into planning processes including schemes, policies and strategies.”*

Given the exponentially-increasing threats to native vegetation and the recent State Draft Native Vegetation Policy direction, the above Objective and Strategy should be at the forefront of any future thinking by the City. Failure to do so may result in losses of native vegetation values which could have been avoided. Related to these threats, could the City explore rezoning land retained as vegetation, as single large blocks vested as Conservation Flora and Fauna and Recreation? We would appreciate this being explored.

### **Conclusion.**

Complex and lengthy as the history of this project has been, the frequent changes and developments within it have been encouraging signs. They may be seen as evidence of the City’s acknowledgement of the community’s love of and concern for the environmental values of the hills, foothills and coastal plain. The changes also reflect continuing efforts by the City to provide adequate and suitable aged care facilities. There are still concerns that the wide-ranging aims of this business plan, in its efforts to satisfy many conflicting needs, may prove difficult to achieve.

Unfortunately, having the “*rehabilitation and re-vegetation*” of TEC areas, as part of Public Open Space upgrades (Fig. 5 note 9), gives great cause for concern, based purely on the complex nature of such assessments and, the apparent absence of environmental staff input to the process. It is unacceptable to have the Department of Sport and Recreation and the Planning Institute of Australia WA, advising the City, through the Public Planning and Design Guide WA and State Public Parklands Strategy.

Inevitably, whilst within the various POS/Parklands guidelines, there is some consideration for the retention and enhancement of environmental values, the major thrust and detail within

those documents relates to the provision of sport and active recreation facilities. It is the Planning section which is charged with reviewing its Public Open Space Strategy at designated times. The next review should ensure a principle of “**Environment in all Policies**” is followed in future POS reviews (see NRPG 2021 submission on the City’s draft Local Biodiversity Strategy (p. 3).

The City staff are to be commended for their preparedness to ensure vital processes such as those requested in our 2018 submission, were carried out. The environmental surveys carried out and actions taken on the results of those surveys, reflect well on staff and this should be acknowledged.

NRPG appreciates the opportunity to make comment on this complex proposal and trusts future opportunities for public input will be invited at later stages of any development.

Yours sincerely,

Anthony Fowler,

pp. Steve Gates, President/Chair